West Horsley Neighbourhood Plan
Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening determination

March 2018

1. Introduction
1.1 This report has been prepared to set out Guildford Borough Council’s determination that the West Horsley Neighbourhood Plan 2016 – 2033 does not require a Strategic Environmental Assessment, or a full Habitats Regulations Assessment, including Appropriate Assessment (HRA stage 2), and the reasons for making that determination.

Strategic Environmental Assessment
1.2 Under European Union Directive 2001/42/EC (the Strategic Environmental Assessment (SEA) Directive), specific types of plans that set the framework for the future development of projects must be subject to an environmental assessment. These are those plans that are likely to have significant environmental effects.

1.3 In accordance with the provisions of the SEA Directive, and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1))¹, the Council must determine whether a plan requires Environmental Assessment. Where the Council determines that SEA is not required then under Regulation 9(3) the Council must prepare a statement setting out the reasons for this determination.

Habitats Regulations Assessment
1.4 Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for European wildlife sites. An HRA is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC and transposed into English Law by Regulation 102 of the Conservation of Habitats and Species Regulations (2010) as amended, the ‘Habitats Regulations’. In accordance with Article 6 of the Habitats Directive (92/43/EC) and Regulation 102 of the Habitats Regulations, Guildford Borough Council must determine whether a plan requires Appropriate Assessment.

¹ These regulations transpose the SEA Directive into English law.
This document forms the Council’s determination as to whether an SEA or Appropriate Assessment is required prior to making (adopting) the West Horsley Neighbourhood Plan.

**Basic conditions**

1.6 Neighbourhood plans must meet the ‘basic conditions’ set out in the Town and Country Planning Act 1990 (as amended). A neighbourhood plans’ compliance with these basic conditions is tested through examination. The basic conditions require that making the plan must not breach, and is otherwise compatible with, EU obligations, such as those in the SEA and Habitats directives.

2. **Background**

2.1 The West Horsley Neighbourhood Plan (the plan) is a Neighbourhood Development Plan for the West Horsley Neighbourhood Area. The West Horsley Neighbourhood Area follows the boundary of West Horsley parish, which forms part of Clandon and Horsley ward. West Horsley is a rural parish located in the eastern area of Guildford borough, to the west of East Horsley. The boundary of the Neighbourhood Area can be seen on the map on page 1 of the SEA and HRA Screening report.

2.2 Once adopted, the West Horsley Neighbourhood Plan will form part of the Development Plan for Guildford Borough. The plan will be in general conformity with the strategic policies of the adopted Guildford Local Plan 2003, which has been subject to both Strategic Environmental Assessment and Habitat Regulations Assessment.

2.3 Although the plan does not allocate sites, general design policies are included to guide development. The Council commissioned JBA Consulting to undertake a high-level screening assessment, which is attached as Appendix 1. The screening report concludes that a full environmental assessment is not required. The report also includes a Habitats Regulations Assessment screening within section 3, which concludes that the plan will not have an adverse impact on the integrity of any European sites.

3. **Consultation**

3.1 In accordance with the SEA regulations, JBA Consulting directly contacted Natural England, Historic England and the Environment Agency (the statutory ‘consultation bodies’ under regulations 4(1) and 9(2)) on Wednesday 3 January 2018 to consult them on the findings of the screening report. The statutory consultees were given until Wednesday 7th March 2018 to provide any comments regarding the screening assessments. Their email asked the three consultation bodies to make a representation in writing if they disagreed with the report’s determination. The Environment Agency was the only consultee to respond and they provided no comments disagreeing with the determination that the West Horsley Neighbourhood Plan does not require a Strategic Environmental Assessment. The other two statutory bodies did not reply to the email, so it was accepted that they agreed in relation to their being no need for SEA.

3.2 It is noted that Natural England submitted a representation to the West Horsley Neighbourhood Plan consultation, which stated that they have no specific comment to make, as the plan does not allocate additional sites for development.
3.3 This determination statement has been published on the Council’s website, along with the address where people may inspect the report or obtain a printed copy of it.

4. Conclusion

4.1 The Screening Report concludes firstly that SEA and HRA are not required; and secondly that no significant effects are likely to occur with regard to the integrity of the European sites within and around Guildford Borough due to the implementation of the Plan. The relevant statutory consultation bodies have not disagreed with these conclusions.

4.2 The Council agrees with the outcome of the screening process undertaken by the consultant, as documented in section 4 of the Screening Report attached at Appendix 1, and the conclusions in section 5 of the report. Therefore, the Council determined that the plan does not require Environmental Assessment or an Appropriate Assessment.
Appendix 1: SEA and HRA Screening Report
(See next page)
West Horsley Neighbourhood Plan 2017 - 2033 Strategic Environmental Assessment and Habitat Regulations Assessment

Screening Report
December 2017

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Revision History

<table>
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<th>Revision Ref / Date Issued</th>
<th>Amendments</th>
<th>Issued to</th>
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<tr>
<td>Draft Report / March 2017</td>
<td>V1.0</td>
<td>Dan Knowles, Guildford Borough Council</td>
</tr>
<tr>
<td>Final Report / December 2017</td>
<td>V2.0 Updated and amended report to coincide with updated West Horsley Neighbourhood Plan Submission Version (October 2017)</td>
<td>Dan Knowles, Guildford Borough Council</td>
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<tr>
<td>Final Report / March 2018</td>
<td>V3.0 Updated to include consultation responses (Section 5.2).</td>
<td>Dan Knowles, Guildford Borough Council</td>
</tr>
</tbody>
</table>

Contract

This report describes work commissioned by Dan Knowles, on behalf of Guildford Borough Council, by an email dated 9th January 2017. Jenny Pullen and Laura Thomas of JBA Consulting carried out this work.

Prepared by .................................................................Jennifer Pullen BSc MSc GradCIEEM Ecologist

Reviewed by .................................................................Laura Thomas BA MRes PGCert CEcol MCIEEM Senior Ecologist

Purpose

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JBA is aiming to reduce its per capita carbon emissions.
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Abbreviations

AONB............................... Area of Outstanding Natural Beauty
DCLG ................................. Department for Communities and Local Government
HRA ........................................ Habitat Regulations Assessment
OPDM ................................. Office of the Deputy Prime Minister
PP ................................. Plan or Programme
SAC ................................. Special Area of Conservation
SANG ................................. Suitable Alternative Natural Greenspace
SEA ................................. Strategic Environmental Assessment
SPA ................................. Special Protection Area
SSSI ................................. Site of Special Scientific Interest
1 Introduction

A Neighbourhood Plan for the parish of West Horsley, within the administrative area of Guildford Borough Council in Surrey (see Figure 1-1), is currently being produced West Horsley Parish Council. This plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning Regulations 2012. The plan covers an 18-year period from 2016 to 2033, and will put in place planning policies that can be used to influence the outcome of future planning applications in the Parish, and will sit alongside the current Guildford Borough Local Plan.

Figure 1-1: West Horsley Parish
The primary aims of this Screening Report are to:

1. identify whether the West Horsley Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) by appraising the potential high-level environmental impacts that may arise from the Neighbourhood Plan and concluding whether there is a need to conduct a full SEA.

2. identify, describe and assess the likely significant effects of implementing the Plan on European designated sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and also Ramsar sites) within and around the parish of West Horsley as part of a Habitats Regulations Assessment (HRA).

The above two aims of this Screening Report are closely interlinked, with the HRA providing supporting evidence for the conclusions reached within the SEA. For clarity and ease of reference this report contains the assessments and conclusions required for both the SEA and the HRA.

Given that the HRA feeds into the conclusions of the SEA, the HRA is first provided in Section 3, with the SEA detailed in Section 4.
2 Legislative Regime

2.1 Strategic Environmental Assessment

The Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations, transpose European Directive 2001/42/EC (the SEA Directive) into English Law. This Directive and Regulations requires a SEA to be undertaken for certain types of plans or programmes that could have a significant environmental effect.

The Regulations form the basis by which all SEAs are carried out to assess the effects and impacts of certain plans and programmes on the environment. Detailed practical guidance on these Regulations can be found in the Office of the Deputy Prime Minister (ODPM) Government publication, *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005). This document has been used as the basis for undertaking this Screening Report, in conjunction with the SEA Regulations.

It is a basic condition of producing a Neighbourhood Plan that EU obligations, as incorporated into UK law, are met; this includes those of the SEA Directive. In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require a SEA (Planning Practice Guidance, 2015). Draft Neighbourhood Plan proposals should therefore be assessed to determine if they are likely to have significant environmental effects (i.e. through a screening assessment as contained within this report). For example, a Neighbourhood Plan may require an SEA where:

- sites are allocated for development.
- the plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan.
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a Sustainability Appraisal of the Local Plan.

If significant environmental impacts are triggered by the implementation of a Neighbourhood Plan, it is considered prudent to advise that a SEA is required. As such, it is important to determine whether there would be significant environmental impacts as per the SEA Directive.

2.2 Habitats Regulations Assessment

European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive) provides legal protection to habitats and species of European importance. The principal aim of this directive is to maintain at, and where necessary restore to, favourable conservation the status of flora, fauna and habitats found at these designated sites (i.e. SACs, SPAs and Ramsar sites). The Directive is transposed into English legislation through the Conservation of Habitats and Species Regulations 2010 (as amended).

It is a requirement of Article 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) that "the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives", where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and where it is not directly connected with or necessary to the management of the site. Article 102 also requires that "in the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional strategy, the Secretary of State must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be)".

The HRA process is underpinned by the precautionary principle, especially in the assessment of potential impacts and their resolution. If it is not possible to rule out likely significant effects on the evidence available, then it is assumed that a risk may exist and it needs to be addressed in the assessment process, preferably through changes to the proposed measure or through options such as avoidance or control measures. Only once this assessment has been completed can it be concluded that there is no adverse risk to a European site resulting from the plan.

Spatial planning documents, such as Neighbourhood Plans, are required to undergo HRA if they are not directly connected with, or necessary to, the management of a European site. As the West
Horsley Neighbourhood Plan is not connected with, or necessary to, the management of European designated sites, it is necessary to undertake a HRA.
3 Habitat Regulations Assessment Screening

3.1 Habitat Regulations Assessment Methodology

Habitat Regulations Assessment follows a three-stage process as outlined in the DCLG guidance "Planning for the Protection of European Sites: Appropriate Assessment". These stages are described in Table 3-1.

Table 3-1: The HRA Process

<table>
<thead>
<tr>
<th>Stage/Task</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>HRA Task 1 - Screening</td>
<td>This process identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and determines whether these impacts are likely to be significant.</td>
</tr>
<tr>
<td></td>
<td>If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, Task 2 is commenced.</td>
</tr>
<tr>
<td>HRA Task 2 - Appropriate Assessment</td>
<td>Task 2 is subsequent to the identification of likely significant effects upon a European site in Task 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in combination with other projects or plans.</td>
</tr>
<tr>
<td></td>
<td>This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e. the interest features of the site).</td>
</tr>
<tr>
<td></td>
<td>If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, task 3 is commenced.</td>
</tr>
<tr>
<td>HRA Task 3 - Mitigation and Alternatives</td>
<td>Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified.</td>
</tr>
<tr>
<td></td>
<td>If suitable avoidance/mitigation or alternative options are identified, that result in there being no adverse impacts from the project or plan on European sites, the project or plan can proceed.</td>
</tr>
<tr>
<td></td>
<td>If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed. However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases compensatory measures must have to be put in place to offset negative impacts.</td>
</tr>
</tbody>
</table>

3.1.1 HRA Task 1 Screening - Methodology

The following section details the methodology of the screening assessment undertaken to identify the likely impacts of the West Horsley Neighbourhood Plan upon European sites, and to determine whether these impacts are likely to be significant and whether an Appropriate Assessment, and mitigation and assessment of alternatives (HRA Task 2 and 3) are required.

Methodology

In order to complete the screening assessment it is necessary to:

- Identify the European sites within and outside the plan area likely to be affected, reasons for their designation and their conservation objectives.
- Describe the plan and its aims and objectives and also those of other projects or plans that in combination have the potential to impact upon the European sites.
- Identify the potential effects on the European sites.
- Assess the significance of these potential effects on the European sites.
The Precautionary Principle
If there is uncertainty, and it is not possible, based on the information available, to confidently determine that there will be no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an Appropriate Assessment (HRA Task 2).

Consultation
It is a requirement of the Habitat Regulations to consult the appropriate nature conservation statutory body. Consultation on the approach to this HRA screening and the information on European sites considered will be undertaken with Natural England as required.

3.2 European Sites
European sites are often collectively known as Natura 2000 sites. Natura 2000 is an EU-wide network of nature protection areas established under the Habitats Directive. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened habitats and species.

Natura 2000 consists of:

- **Special Areas of Conservation (SACs)** - these are designated under the UK Regulations made under the Habitats Directive to protect those habitat types and species that are considered to be most in need of conservation at a European level (excluding birds).
- **Special Protection Areas (SPAs)** - these are designated under the UK Regulations under the Birds Directive to protect rare and vulnerable birds, and also regularly occurring migratory species
- **Ramsar sites** - these are wetlands of international importance designated under the Ramsar Convention.

Although not included in the European legislation, as a matter of policy, Ramsar sites in England are protected as European sites. The vast majority are also classified as SPAs and Sites of Special Scientific Interest (SSSIs). All SPAs and terrestrial SACs in England are also designated as SSSIs under the Wildlife and Countryside Act (1981) as amended.

3.2.1 European Sites in and around West Horsley Parish

Best practice guidance suggests that sites occurring within a wider area of approximately 10km to 15km from the boundary of the area directly affected by a plan should be identified and assessed as part of the HRA screening process, in addition to those sites located within the plan area. However, it is important to consider the possibility of impacts for any European site which might be affected, whatever their location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan. For the West Horsley Neighbourhood Plan a buffer of 10km has been applied given the relatively small size of the parish and it is considered that no pathways, including hydrological connections, exist that would impact upon any European sites beyond this extent.

There are no SACs, SPAs and Ramsar sites located within West Horsley Parish.

There is one SAC and one SPA located within 10km of West Horsley Parish, these sites are listed in Table 3-2, below, and shown on Figure 3-1. Both of these sites are composed of a series of separate areas that form the SAC/SPA.

**Table 3-2: European Sites within and adjacent to West Horsley Parish**

<table>
<thead>
<tr>
<th>Designation</th>
<th>Site</th>
<th>Distance and Direction at Closest Point to Parish Boundary</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAC</td>
<td>Mole Gap to Reigate Escarpment</td>
<td>6.3km east</td>
</tr>
<tr>
<td>SPA</td>
<td>Thames Basin Heaths</td>
<td>2.4km north</td>
</tr>
</tbody>
</table>
Figure 3-1: Location of European Sites within West Horsley Parish and a 10km Buffer
Table 3-3: Details of European Sites within 10km buffer around West Horsley Parish (Information from JNCC, 2017; Natural England, 2017, 2014a and 2014b)

<table>
<thead>
<tr>
<th>European Site</th>
<th>Qualifying Feature (Broad Habitat/Species Groupings)</th>
<th>Qualifying Features</th>
<th>Conservation Objectives</th>
<th>Site Vulnerability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mole Gap to Reigate Escarpment SAC</td>
<td>Dry woodlands and scrub, Dry grassland, European dry heaths, Amphibia, Mammals of woodland habitats</td>
<td>Stable xerothermophilous formations with <em>Buxus sempervirens</em> on rock slopes (<em>Berberidion</em> p.p.) [5110] Semi-natural dry grasslands and scrubland facies on calcareous substrates (<em>Festuco-Brometalia</em>) (<em>important orchid sites</em>) [6210] <em>Taxus baccata</em> woods of the British Isles <em>Priority feature</em> [91J0] European dry heaths [4030] <em>Asperulo-Fagetum</em> beech forests [9130] Great crested newt <em>Triturus cristatus</em> [1166] Bechstein’s bat <em>Myotis bechsteinii</em> [1323]</td>
<td>To ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: - The extent and distribution of qualifying natural habitats and habitats of qualifying species - The structure and function (including typical species) of qualifying natural habitats - The structure and function of the habitats of qualifying species - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely - The populations of qualifying species, and, - The distribution of qualifying species within the site.</td>
<td>Disease, Inappropriate scrub control, Change in land management, Public access/ disturbance, Air pollution: risk of atmospheric nitrogen deposition</td>
</tr>
<tr>
<td>Thames Basin Heaths SPA</td>
<td>Birds of woodland and scrub, Birds of lowland heaths and brecks</td>
<td>During the breeding season the area regularly supports: <em>Nightjar Caprimulgus europaeus</em> (7.8% of the GB breeding population Count mean (RSPB 1998-99)) <em>Woodlark Lullula arborea</em> (9.9% of the GB breeding population Count as at 1997 (Wotton &amp; Gillings 2000)) <em>Dartford Warbler Sylvia undata</em> (27.8% of the GB breeding population Count as at 1999 (RSPB))</td>
<td>To ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: - The extent and distribution of the habitats of the qualifying features - The structure and function of the habitats of the qualifying features - The supporting processes on which the habitats of the qualifying features rely - The population of each of the qualifying features, and, - The distribution of the qualifying features</td>
<td>Public access/ disturbance, Undergrazing, Forestry and woodland management, Hydrological changes, Inappropriate scrub control, Invasive species</td>
</tr>
<tr>
<td>European Site</td>
<td>Qualifying Feature (Broad Habitat/Species Groupings)</td>
<td>Qualifying Features</td>
<td>Conservation Objectives</td>
<td>Site Vulnerability</td>
</tr>
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<tr>
<td></td>
<td></td>
<td></td>
<td>within the site.</td>
<td>Wildlife/arsen</td>
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<td></td>
<td></td>
<td></td>
<td>Air pollution: impact of atmospheric nitrogen deposition</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Feature location/ extent/ condition unknown</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Military</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Habitat fragmentation</td>
</tr>
</tbody>
</table>
3.3 Potential Hazards to European Sites

Neighbourhood Plans, with the spatial planning policies they contain, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct such as habitat loss, fragmentation or degradation, or indirect such as disturbance from recreational activities or pollution from construction and transportation.

This section identifies the potential hazards to European sites within the 10km buffer around West Horsley Parish which may arise as a result of the implementation of the Neighbourhood Plan, and then goes on to identify the types of hazards to which the qualifying features present within the sites are particularly sensitive.

3.3.1 Hazards to Sites

The two European sites within the 10km buffer around West Horsley Parish mainly consist of dry woodland, grassland and heaths, with considerable bird, amphibian and bat interest. Potential hazards to the interest features are identified in Table 3-4 below.

Table 3-4: Potential Hazards to the European sites within the 10km buffer around West Horsley Parish

<table>
<thead>
<tr>
<th>Potential Hazard</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Habitat loss</td>
<td>This is a loss of habitat within the designated boundaries of a European site – it is expected that there would be no direct loss as a result of the Neighbourhood Plan implementation as both Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA are located outside of West Horsley Parish boundary.</td>
</tr>
<tr>
<td>Habitat fragmentation</td>
<td>This is where activities result in the separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species by disrupting movement corridors. It can also damage the integrity of European Sites by isolating habitats and the species present from other areas, outwith the site boundaries, that are important for certain aspects of their lifecycle. In relation to the Thames Basin Heaths SPA, Natural England (2015) identifies that fragmentation of the complex means that recovery after adverse impacts such as fires or severe winters is restricted, potentially preventing species from recolonising and this has led to high risk of local extinctions in parts of the complex.</td>
</tr>
<tr>
<td>Changes in physical regime</td>
<td>These are changes to physical processes that will alter the present characteristics of the European site e.g. fluvial and geomorphological processes, erosion processes, deposition.</td>
</tr>
<tr>
<td>Physical damage</td>
<td>This includes recreational pressures such as trampling and erosion, and where sites are close to urban areas, other damaging activities may occur such as rubbish tipping, vandalism, arson, and predation (particularly by cats).</td>
</tr>
<tr>
<td>Habitat/community simplification</td>
<td>Changes to environmental conditions, due to human activities, that result in a reduction and fragmentation of habitats that will reduce biodiversity.</td>
</tr>
<tr>
<td>Disturbance (noise, visual)</td>
<td>Activities which result in disturbance, causing sensitive birds and mammals to deviate from their normal, preferred behaviour. These can be caused by construction activities, recreational/amenity use of an area, traffic etc. Natural England (2014b) identify that the Thames Basin Heaths SPA is subject to high levels of recreational use, with dog walkers making up a large proportion of visitors. Similarly, Natural England (2014a) identify increasing population and disturbance impacts as a threat to the Mole Gap to Reigate Escarpment SAC given that Surrey is heavily populated.</td>
</tr>
<tr>
<td>Competition from non-native species</td>
<td>Activities may cause the introduction or spread of non-native animals and plants which could result in changes to community composition and even to the complete loss of native communities. Natural England (2014b) identify that the Thames Basin Heaths SPA is at risk from the shrubs Rhododendron and Gaultheria.</td>
</tr>
<tr>
<td>Change in water levels or table</td>
<td>Activities which may affect surface and groundwater levels, such as land drainage and abstraction, may have adverse impacts on water dependant habitats and species. Natural England (2015b) identify that in certain parts of the Thames Basin Heaths SPA, drainage impacts are damaging.</td>
</tr>
<tr>
<td>Changes in water quality</td>
<td>Activities which may impact upon water quality, such as accidental pollution spills, run-off from urban areas, nutrient enrichment from agriculture, and discharge from sewage works, may adversely affect wetland habitats and</td>
</tr>
</tbody>
</table>
3.3.2 Qualifying Features and Sensitivity to Hazards

Table 3-5 below, shows the qualifying features of the European sites within the 10km buffer around West Horsley Parish and identifies the hazards to which they are potentially sensitive (see Table 3-3).

It must be noted that during the assessment of the potential impacts of the Neighbourhood Plan on a European site, all of the potential hazards will be considered.

Table 3-5: Sensitivity of European Sites to Potential Hazards

<table>
<thead>
<tr>
<th>Potential Hazards</th>
<th>Habitats lost</th>
<th>Habitats fragmentation</th>
<th>Changes in physical regime</th>
<th>Physical damage</th>
<th>Habitat/ community simplification</th>
<th>Disturbance (noise, visual)</th>
<th>Competition from non-native species</th>
<th>Changes in water levels of Table</th>
<th>Changes in water quality</th>
<th>Changes to surface water flooding</th>
<th>Turbidity and siltation</th>
<th>Pollution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mole Gap to Reigate Escarpment SAC</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Dry woodlands and scrub</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Dry grassland</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>European dry heaths</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Amphibia</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Mammals of woodland habitats</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Thames Basin Heaths SPA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Birds of woodland and scrub</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Birds of lowland heaths and brecks</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>§</td>
<td>±</td>
<td>§</td>
<td>§</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

3.4 Description of the Vision of the Neighbourhood Plan

This section provides a summary of the West Horsley Neighbourhood Plan vision (October 2017). The following vision from the West Horsley Neighbourhood Plan is inspired by a community survey and interaction with local residents during the preparation of the plan. The vision for the future of the Parish is:

“To achieve the incremental and well planned sustainable development of West Horsley, which respects the rural nature of the Parish, its architectural heritage, special character...”
and its environmental assets, and which offers housing and community facilities that meet the needs of all generations.”

To successfully deliver the above vision, a number of objectives have been proposed to inform the West Horsley Neighbourhood Plan (October 2017):

- To preserve the special character of the Parish and the surrounding countryside, which is at present within the Green Belt.
- The protection of the historic and architectural character of the West Horsley Conservation Area and listed buildings that define the village.
- The protection and enhancement of valued environmental assets, biodiversity, key views and landscape features.
- The provision of new homes on small sites to meet the local need for housing, notably of older households wanting to downsize and of newly forming households from local families.
- To secure the long-term future of community and cultural facilities - village hall, shop, the Raleigh School, West Horsley Place (including the development of on-site educational, musical and creative facilities to encourage learning across all ages) - and to support proposals for enhanced health services in West Horsley.
- To support the continued provision of pre-school and primary school facilities within West Horsley, so that families in the village have the opportunity for their children to attend a local school if that is their preference.
- To support the retention and development of local businesses and employment opportunities in order to meet the needs of the village community.
- To promote better transport links within, and to and from, West Horsley, including encouraging more families and children to be able to walk and/or cycle to and from school, rather than being reliant on motor transport; and to better manage traffic through the area resulting from the economic pull of London, Guildford and Leatherhead.

### 3.5 Other Relevant Plans and Projects that might act in-combination

A series of individually modest effects may in combination produce effects that are likely to adversely affect the integrity of one or more European sites. Article 6(3) of the Habitats Directive tries to address this by taking into account the combination of effects from other plans or projects. The Directive does not explicitly define which other plans and projects are within the scope of the combination provision. Guidance in section 4.4.3 of ‘Managing Natura 2000 sites: The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC’, published by the European Commission, states:

> 'When determining likely significant effects, the combination of other plans or projects should also be considered to take account of cumulative impacts. It would seem appropriate to restrict the combination provision to other plans or projects which have been actually proposed'.

Table 3-6 below lists the relevant plans and projects that have been identified as having the potential to result in adverse effects on European sites in combination with the West Horsley Neighbourhood Plan.

**Table 3-6: Other Plans and Projects**

<table>
<thead>
<tr>
<th>Plan/Project</th>
<th>Potential In-combination Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Planning Policy Framework (NPPF)</td>
<td>The NPPF sets out national planning policy to be taken into account by councils when preparing new local plans and taking decisions on planning applications. In relation to conserving and enhancing the natural environment the NPPF states that the planning system should contribute and enhance the natural and local environment through minimising impacts on biodiversity and providing net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures. It also requires local planning authorities to set criteria based policies against which proposals for any developments on, or affecting, protected wildlife will be judged, with distinctions made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status.</td>
</tr>
</tbody>
</table>

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2017s5493 West Horsley NP SEA and HRA V3.0 12
The presumption in favour of sustainable development, enshrined within the NPPF, does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

<table>
<thead>
<tr>
<th>Plan/Project</th>
<th>Potential In-combination Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Local Plan (2003) and Emerging Local Plan</td>
<td>The Guildford Local Plan (2003) contains a number of policies relating to housing, infrastructure, cultural heritage, recreation and the environment. Once the West Horsley Neighbourhood Plan has been adopted or ‘made’ it will form part of the emerging Local Plan for Guildford. Policies within the Guildford Local Plan and West Horsley Neighbourhood Plan are therefore consistent with each other. The Guildford Local Plan (2003) contains a policy (NE1) which relates directly to the protection of European sites; this states that planning permission will not be granted for proposals which are likely to destroy or have an adverse effect directly or indirectly on the nature conservation value of SPAs and SACs. It should be noted that the Local Plan 2003 is going to be replaced by a new Local Plan. Consultation on the Proposed Submission Local Plan: strategy and sites was undertaken in 2016. Until that time, as the Local Plan Strategy and sites progresses through submission, examination and adoption it will gather weight in planning decision-taking, in accordance with National Planning Policy Framework. This 2016 plan contains a policy (PS5) specifically related to the Thames Basin Heaths SPA that states permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths SPA, whether alone or in combination with other development (Guildford Borough Council, 2016).</td>
</tr>
<tr>
<td>Thames Basin Heaths Special Protection Area: Avoidance Strategy 2009 - 2016</td>
<td>Natural England has recognised that residential development across the South East region could potentially adversely impact on the Thames Basin Heaths SPA through increased recreational use creating disturbance impacts. Guildford Borough Council, along with all other councils where development has the potential to impact upon the SPA, have therefore developed avoidance strategies, in conjunction with Natural England, to identify where adverse impacts may arise and the avoidance and/or mitigation measures required. The avoidance strategy should prevent a situation arising where Local Authorities will not be able to grant planning permission for further residential development within 5km of these designated heathlands (the area identified as the Zone of influence for cumulative impacts). This strategy therefore provides an assessment framework to identify where policies of the West Horsley Neighbourhood Plan may result in adverse impacts on the SPA and this is taken into account throughout this HRA. Although this strategy is date from 2009-2016, no new updated document has been identified at this stage.</td>
</tr>
<tr>
<td>The South East Plan - Regional Spatial Strategy for the South East 2009</td>
<td>Although the Regional Spatial Strategy for the South East has now been partially revoked under the 2013 Localism Bill, policy NRM6 relating to the Thames Basin Heaths SPA was retained and remains a material consideration as part of development planning. This policy is linked to the Avoidance Strategy detailed above. Policy NRM6 relates to new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths SPA. Any development which may impact upon the SPA is required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects, and these measures must be agreed with Natural England. Policy NRM6 advocates directing development to areas where potential adverse effects can be avoided without the need for mitigation. However, where mitigation measures are required three principles are set out, including: 1. A zone of influence set at a 5km linear distance from the SPA boundary is established where measures must be taken to ensure that the integrity of the SPA is protected. 2. Within this zone of influence there will be a 400m ‘exclusion zone’ where mitigation measures are unlikely to be capable of protecting the integrity of the SPA. In exceptional circumstances, this may vary with the provision of evidence to demonstrate that the integrity of the SPA will be protected. These locally determined zones will be set out in local development frameworks and agreed</td>
</tr>
</tbody>
</table>
### Plan/Project | Potential In-combination Effects
--- | ---
with Natural England.
3. Where development is proposed outside the exclusion zone, but within the zone of influence, mitigation measures will be delivered prior to occupation and in perpetuity. Measures will be based on a combination of access management, and the provision of Suitable Accessible Natural Greenspace (SANG).

Policy NRM6 also details the requirements of SANG provision, namely:
1. A minimum of eight hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.
2. Developments of fewer than 10 dwelling should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings.
3. Access management measure will be provided strategically to ensure that adverse impacts on the SPA are avoided and that SANG functions effectively.
4. Authorities should co-operate and work jointly to implement mitigation measures. These include, inter alia, assistance to those authorities with insufficient SANG land within their own boundaries, co-operation on access management and joint development plan documents.
5. Relevant parties will co-operate with Natural England and landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/amend the approach set in this policy, as necessary.
6. Local authorities will collect developer contributions towards mitigation measures, including the provision of SANG land and joint contributions to the funding of access management and monitoring the effects of mitigation measures across the SPA.
7. Large developments may be expected to provide bespoke mitigation that provides a combination of benefits including SANG, biodiversity enhancement, green infrastructure, and potentially, new recreational facilities.

Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.

This policy provides a framework for the protection of the Thames Basin Heaths SPA and will therefore help to prevent adverse in-combination effects with other plans, policies and programmes implemented in the region. The West Horsley Neighbourhood Plan will have to ensure that its policies are consistent with the requirements of policy NRM6, and this HRA demonstrates that this is the case.

3.6 Screening Assessment

This section considers the objectives identified in the Submission Version West Horsley Neighbourhood Plan (October 2017) that are considered to have an impact on European Sites and identifies whether or not they are likely to have significant effects on site integrity, either alone or in-combination with other plans and/or projects, as detailed in Table 3-6.

Taking into account the location of the European sites in relation to West Horsley Parish and the identified potential hazards associated with the objectives and policies of the Neighbourhood Plan, an assessment has been made as to whether the Neighbourhood Plan, alone and in-combination with other plans and/or projects, will have likely significant effects on any European sites. This assessment is detailed in Table 3-7. Full wording of the policies and proposals can be found within the Submission Version West Horsley Neighbourhood Plan (October 2017).

It should be noted that the current Submission Version West Horsley Neighbourhood Plan (October 2017) does not allocate any specific sites for development, it provides only planning policies that can be used to influence the outcome of future planning applications in the Parish, and will sit alongside the current Guildford Borough Local Plan.

The Submission Version West Horsley Neighbourhood Plan (October 2017) refers to a number of Character Areas in several of its policies; these Character Areas are shown in Appendix A.
### Table 3-7: Assessment of West Horsley Neighbourhood Plan Objectives and Policies on European Sites

<table>
<thead>
<tr>
<th>Policies and Proposals</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing and Design</strong></td>
<td><strong>WH1: West Horsley Conservation Area</strong> This policy proposes that to the west of The Street and on Ripley Lane and to the east of The Street and Silkmore Lane, the spacious nature of these areas should not be altered. It further identifies which building materials are accepted, to retain low boundary walls, hedges and natural verges. This policy aims to avoid unnecessary loss of mature trees and established hedgerows. This policy further states that any development should be empathetic to the diverse style of the existing built environment as detailed in the Evidence Base: West Horsley Character Appraisal Report (WHCAR) (2017a).</td>
<td>As this policy relates to the character and appearance of new development within the West Horsley Conservation Area, as opposed to new development per se, it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA. Additionally, the policy states that any development of 10 or more dwellings, within the 5km Zone of Influence of the Thames Basin Heaths SPA, the development will only proceed once appropriate SANG has been provided and approved. Therefore, this further identifies that this policy will not result in any adverse impacts on the SAC and SPA by reducing potential increased visitor pressure.</td>
<td>None</td>
</tr>
<tr>
<td><strong>WH2: Design Management within Village Settlement</strong></td>
<td>This policy relates to development within the village settlement, specifically Character Areas 4, 5 and 8 as detailed in the Neighbourhood Plan (October 2017). This policy requires that development proposals build attractive dwellings, which are designed to reflect local housing styles within the specified Character Areas, and will not exceed 2 storeys. All building plots will have to have low front boundaries, and off street parking, and will be sympathetic to the local area. Further to this, natural materials in housing design should be used which is detailed in the WHCAR (2017a). Additionally, the policy suggests a limit of 10-15 dwellings per hectare (however, no specific sites are allocated for development). Tree surgery or removal will be avoided, if possible, and natural green spaces for wildlife will be encouraged.</td>
<td>Whilst this policy does not identify any specific sites for development, it is concerned with the type, appearance, and density of development within the village settlement, in specified Character Areas of the Parish. By supporting developments that meet set criteria under this policy, it therefore has the potential to impact upon European sites, even though the location and extent of development pursued in line with this policy is currently unknown. Given that West Horsley Parish falls within 2.3km south-east of the Thames Basin Heaths SPA and 6.0km west of the Mole Gap to Reigate Escarpment SAC there will be no direct impact upon these sites from development pursued under this policy, however, indirect impacts may occur. Specifically, in relation to the SPA the neighbourhood area is outside the 400m exclusion zone where there is a presumption against additional net new dwellings due to the pressure of increased recreational use. However, the northern part of the Parish (including all of Character Area 8 and parts of Character Areas 4 and 5) do fall within the 5km Zone of Influence where avoidance measures may be required for new development. However, this policy is concerned with development within the village settlement areas themselves, and as such the size of</td>
<td>None</td>
</tr>
<tr>
<td>Policies and Proposals</td>
<td>Policy Summary</td>
<td>Assessment of likelihood of significant effects</td>
<td>Significant effects</td>
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<td>------------------------</td>
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<td></td>
<td></td>
<td>developments are likely to be small, particularly as a limit a of 10-15 dwellings per hectare is required under this policy. Further to this, the policy states that any development of 10 or more dwellings, within the 5km Zone of Influence of the Thames Basin Heaths Special Protection Area, the development will only proceed once appropriate SANG has been provided and approved. Guildford Borough Council (2015) detail in the SPA Avoidance Strategy that developments of less than 10 dwellings within 5km of the SPA do not need to be within a specified distance of SANG provided that a sufficient quantity and quality of SANG land to cater for the consequent increase in population is identified and available in the borough and functional in advance of completion. Given that Guildford Borough Council (2015) identifies five SANG sites which have been approved by Natural England, along with another two potential sites, it is considered there is sufficient SANG available within Guildford Borough to avoid impacts on the SPA from small-scale developments likely to be supported by this policy. Furthermore, the West Horsley Neighbourhood Plan contains a number of policies to create new green spaces and recreational assets within the neighbourhood area, and to protect/maintain those already present (e.g. WH6 which protects community facilities including a number of recreational assets, WH11 which designates 15 Local Green Spaces and WH12 which identifies the green and blue infrastructure network across the Parish). This will create alternative assets to reduce pressures on the SPA, and also the SAC, thereby minimising any indirect adverse impacts from increased recreational pressures. Policy WH2 itself also encourages the creation of new green spaces which could reduce potential recreational pressures on the Thames Basin Heaths SPA by creating alternative areas. Additionally, creating new nature green spaces will help to maintain habitat connectivity between the village and the designated sites. Additionally, Policy WH14 of the Neighbourhood relating to biodiversity enshrines within planning policy that development proposals must seek to avoid having any significant environmental effects on designated environmental sites,</td>
<td></td>
</tr>
</tbody>
</table>
### Policies and Proposals

<table>
<thead>
<tr>
<th>WH3: Design Management within Rural Areas</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>This policy requires design management to preserve the landscape setting (e.g. woodland character), all dwelling positions should respect the landscape views and rural development proposals must have full regard to the WHCAR (2017a). Any development which proposes to replace smaller scale dwellings with large dwellings will not be supported. Building</td>
<td>As this policy is concerned with ensuring that development proposals do not negatively impact the current landscape setting and architectural design within the named Character Areas, and it does not allocate any specific sites for development, it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA.</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Policies and Proposals</td>
<td>Policy Summary</td>
<td>Assessment of likelihood of significant effects</td>
<td>Significant effects</td>
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<td></td>
<td>materials within these Character Areas (i.e. 1, 2, 3, 6, 7 and 9) should be limited to red brick and clay tile hung elevations, and plain clay terracotta roof tiles. Any development of 10 or more dwellings, within 5km of Thames Basin Heaths SPA, must have a Landscape Visual Impact Assessment (LVIA).</td>
<td>As this policy is concerned with mix housing types within developments, and not development per se, with no specific areas allocated for development, there will be no adverse impacts upon Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA as a result of this policy.</td>
<td>None</td>
</tr>
<tr>
<td>WH4: Housing Mix</td>
<td>New residential developments within the defined settlement boundary (i.e. Character Areas 4 and 8) will be supported where they include mix housing types. This includes open market two to three-bedroom family homes and two to three bedroom bungalows for younger families and older households, with 40% affordable housing. Proposals for fully serviced plots for individual or community led schemes will also be supported. Proposals that wish to extend or improve existing two or three bedroom houses will not be supported. This policy does not allocate any specific sites for development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WH5: Rural Exception Housing</td>
<td>This policy will support small scale (10 dwellings or fewer) affordable housing developments adjoining the village settlement boundary, providing: the open market housing is no more than 30% of the total dwellings; the design maintains the Green Belt character; and the occupation of the affordable homes will be limited to people with a local connection. This policy does not allocate any specific sites for development. This policy relates to Character Areas 1, 3, 6, 7 and 9.</td>
<td>This policy aims to ensure that all small-scale affordable housing developments adhere to local character and landscape, and it supports the Guildford Borough Council (2003) Local Plan policy H12, as the small-scale developments cannot exceed 0.4ha and are defined as 10 dwellings or fewer. Whilst this policy does not allocate specific sites for rural development, by supporting rural development this policy does have the potential to impact upon European sites. Given that West Horsley Parish falls within 2.3km south-east of the Thames Basin Heaths SPA and 6.0km west of the Mole Gap to Reigate Escarpment SAC there will be no direct impact upon these sites from these policies, however, indirect impacts may occur. Specifically, in relation to the SPA the neighbourhood area is</td>
<td>None</td>
</tr>
<tr>
<td>Policies and Proposals</td>
<td>Policy Summary</td>
<td>Assessment of likelihood of significant effects</td>
<td>Significant effects</td>
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<tr>
<td></td>
<td></td>
<td>outside the 400m exclusion zone where there is a presumption against additional net new dwellings due to the pressure of increased recreational use. However, the northern part of the Parish does fall within the 5km Zone of Influence where avoidance measures may be required for new development. However, Guildford Borough Council (2015) detail in the Avoidance Strategy that developments of less than 10 dwellings (as is required by this policy) within 5km of the SPA do not need to be within a specified distance of SANG provided that a sufficient quantity and quality of SANG land to cater for the consequent increase in population is identified and available in the borough and functional in advance of completion. Given that Guildford Borough Council (2015) identifies five SANG sites which have been approved by Natural England, along with another two potential sites, it is considered there is sufficient SANG available within Guildford Borough to avoid impacts on the SPA from these small-scale developments. Furthermore, the West Horsley Neighbourhood Plan contains a number of policies to create new green spaces and recreational assets within the neighbourhood area, and protect/maintain those already present (e.g. WH6 which protects community facilities including a number of recreational assets, WH11 which designates 15 Local Green Spaces and WH12 which identifies the green and blue infrastructure network across the Parish). This will create alternative assets to reduce pressures on the SPA, and also the SAC, thereby minimising any indirect adverse impacts from increased recreational pressures. Additionally, Policy WH14 of the Neighbourhood relating to biodiversity enshrines within planning policy that development proposals must seek to avoid having any significant environmental effects on designated environmental sites, especially the Thames Basin Heaths SPA. Beyond this, rural developments within the 5 - 7km area from the SPA would not require consideration with regards to the impact on the heaths, or avoidance measures, as developments under this policy would be very small-scale. There is no such strategy for Mole Gap to Reigate Escarpment.</td>
<td></td>
</tr>
</tbody>
</table>
### Community Assets, Infrastructure & Business Economy Policies

<table>
<thead>
<tr>
<th>Policies and Proposals</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
</thead>
</table>
| WH6: Community Facilities | Development proposals which will result in the loss of a community facility will not be supported. Community facilities include:  
- The Wheelhouse, East Lane  
- The Barley Mow, The Street  
- West Horsley Village Hall, The Street  
- West Horsley Village Hall Playground, The Street  
- Methodist Church & Wesley Room, The Street  
- King William IV, The Street  
- Goodhart Rendel Hall, Cranmore Lane  
- St Mary's Church, Epsom House  
- Whips Coach House, The Street | SAC, however, the Site Improvement Plan (Natural England, 2015a) does identify that this area of Surrey is heavily populated and that increased visitor pressure can become damaging to the protected sites and disturb the species they support. However, this plan identifies a number of on-site measures to help minimise disturbance impacts from increasing population density in the area (e.g. securing existing hibernacula and ponds, and building new ponds) and the policies of the Neighbourhood Plan will not prevent implementation of these. In addition, the Mole Valley Local Development Framework Mole Gap to Reigate Escarpment SAC Guidance Note (Mole Valley District Council, 2012) safeguards a buffer zone, extending 800m beyond the boundary of the SAC, within which there is a presumption against any increase in residential or employment related development unless its impact can be mitigated. As West Horsley neighbourhood area is 6.0km from the SAC boundary it is compliant with this strategy to avoid impacts. Consequently, no adverse effects on this SAC from implementation of this Neighbourhood Plan policy is anticipated. This policy will therefore not have any adverse impacts upon Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA. | None |
<table>
<thead>
<tr>
<th>Policies and Proposals</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>WH7: Educational Provision</td>
<td>If a planning application is submitted which proposes to move the Raleigh School to within the village, this will be supported if: the site is appropriate, the school design compliments the local area, adequate provision for walking and/or cycling to and from the school is provided, the infrastructure will support long-term demands, no adverse impacts upon residential properties arise, and no implications on health and safety occur.</td>
<td>This policy is concerned with the relocation of the Raleigh school, which could cause loss of habitat locally within the Parish. However, there would be no direct impact on the SPA and SAC, and development would have to abide by all policies and legislation and therefore no adverse impact upon the SAC and SPA are likely.</td>
<td>None</td>
</tr>
<tr>
<td>WH8: Local Buildings of Historic Interest</td>
<td>This policy designates specific buildings or structures as Local Heritage Assets; a total of 18 buildings/structures have been listed within the Neighbourhood Plan. Designation as a Local Heritage Asset gives them additional protection, recognising the important contribution they make to the special character of the Parish.</td>
<td>This policy is concerned with historic buildings/structures and provides additional protection to Local Heritage Assets not protected by other designations or legislation. Therefore, this policy will have no adverse impacts upon the designated sites.</td>
<td>None</td>
</tr>
<tr>
<td>WH9: West Horsley Place</td>
<td>There are proposals, by the trustees of Mary Roxburghe Trust, to restore West Horsley Place and expand the current facilities to support increasing tourist demand. This policy supports this proposal.</td>
<td>As this policy is concerned with an historic building and will only involve alterations to the current site, it is concluded that this policy will have no adverse impacts upon the SAC or SPA. Furthermore, this policy will support the Thames Basin Heaths SPA Avoidance Strategy as the restoration and expansion of alternative tourist facilities should help reduce visitor demand at Thames Basin Heaths SPA.</td>
<td>None</td>
</tr>
<tr>
<td>WH10: Employment</td>
<td>This policy states that the Neighbourhood Plan</td>
<td>Given that this policy focuses on areas within the Parish itself</td>
<td>None</td>
</tr>
</tbody>
</table>
### Policies and Proposals

<table>
<thead>
<tr>
<th>Environment and Landscape Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WH11: Local Green Spaces</strong></td>
</tr>
<tr>
<td>West Horsley has 13 sites designated as Local Green Spaces. This policy provides protection for these Local Green Spaces as any development proposals will be resisted, unless it can be demonstrated that the developments are minor and will enhance the area. Additionally, as West Horsley is located within the Green Belt, these Local Green Spaces are already protected by this designation.</td>
</tr>
<tr>
<td>As this policy designates a number of areas as green spaces which are protected from development it will not result in any adverse impacts on the Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA.</td>
</tr>
</tbody>
</table>

| **WH12: Green and Blue Infrastructure Network** |
| This policy aims to protect any green or blue infrastructure from development by stating that any development proposals within or adjoining the network must demonstrate how the development will maintain or enhance these areas. This policy will support any development to create new green and blue infrastructure. |
| As this policy provides protection for green (e.g. woodlands, footpaths) and blue (e.g. waterbodies) infrastructure, it will not result in any adverse impacts on the Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA. Additionally, the creation of green and blue infrastructure will be supported, which could also be used as potential alternative recreational and amenity assets which could help reduce the recreational pressure on the SAC and SPA. | None |

| **WH13: Sustainable Urban Drainage** |
| This policy requires development proposals to include one or more of the specified sustainable drainage features and to demonstrate that there is adequate waste water capacity. West Horsley experiences significant surface water flooding during rainfall and therefore this policy aims to ensure this flood risk does not increase. |
| As this policy aims to ensure any proposed development does not increase the risk of flood within West Horsley, it will protect the wider environment and therefore it will not result in any adverse impacts on the SAC and SPA. | None |

<p>| <strong>WH14: Biodiversity</strong> |
| This policy will not support any developments |
| Given this policy is concerned with protecting and enhancing | None |</p>
<table>
<thead>
<tr>
<th>Policies and Proposals</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>that may have an impact upon designated environmental and landscape assets, with particular reference to Thames Basin Heath SPA, Surrey Hills Area of Outstanding Natural Beauty (AONB), Sheeples SSSI, Lollesworth Wood Site of Nature Conservation Importance (SNCI), Parkrow Copse SNCl, Great Wix Wood SNCl and Upper Weston Wood SNCl. The developments must additionally contribute, increase and enhance the natural environment and any proposed tree/hedge planting must use indigenous trees which are appropriate to the setting and character of the area.</td>
<td>biodiversity and designated sites within the Parish it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA. It will provide additional level of protection to these nature conservation sites through Neighbourhood planning policy.</td>
<td>None</td>
</tr>
<tr>
<td>WH15: Dark Skies</td>
<td>This policy aims to reduce light pollution by ensuring all development proposals have been appropriately designed to reduce the occurrence of light pollution.</td>
<td>As this policy is concerned with ensuring development proposals are designed to reduce light pollution, it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA.</td>
<td>None</td>
</tr>
</tbody>
</table>
3.7 Habitats Regulations Assessment Statement and Conclusions

This Screening Assessment has examined the West Horsley Neighbourhood Plan objectives and policies for any impacts on the European sites within the Parish or within 10km of the Parish. The assessment further took into account in-combination effects with other relevant plans and strategies.

There are no European Sites within West Horsley Parish, and this Screening Assessment has not identified any adverse impacts on European sites within 10km of the neighbourhood area boundary.

The Plan comprises of a number of key objectives relating to housing and design, community assets and business economy, and environment and landscape, under which site a number of specific policies. Given the scale and nature of the objectives and policies within the plan, many of which are consistent with the conservation objectives of the SAC and SPA, no significant adverse impacts have been identified.

The northern extent of West Horsley Parish is located within the 5km Zone of Influence of the Thames Basin Heaths SPA. The Neighbourhood Plan does not currently allocate any sites for development, however, it does contain policies that will support developments that adhere to the criteria specified in the policy relating to factors such as architectural style, dwelling density and housing mix. However, whilst the location and extent of development pursued under the Neighbourhood Plan is currently unknown, it is necessary to apply the precautionary principle, and the potential impact of residential developments within the village settlement (policy WH2) and rural areas (policy WH5) has therefore been considered. The requirements of the policy and locality indicate that any development will be of a small scale (<10 dwellings). Guildford Borough Council (2015) detail in the Thames Basin Heaths SPA Avoidance Strategy that developments of less than 10 dwellings within 5km of the SPA do not need to be within a specified distance of SANG provided that a sufficient quantity and quality of SANG land to cater for the consequent increase in population is identified and available in the borough and functional in advance of completion. Given that Guildford Borough Council (2015) identifies five SANG sites which have been approved by Natural England, along with another two potential sites, it is considered there is sufficient SANG available within Guildford Borough to avoid impacts on the SPA from small-scale developments pursued under policies WH2 and WH5. Furthermore, policies WH1, WH2 and WH3 state that any developments of 10 or more dwellings, within the 5km Zone of Influence of the Thames Basin Heaths SPA, will only proceed once appropriate SANG has been provided and approved, which supports Policy NRM6 of The South East Plan.

In conclusion, the Submission Version West Horsley Neighbourhood Plan (October 2017) will not have an adverse impact on the integrity of any European sites identified.
4 Strategic Environmental Assessment Screening

4.1 SEA Screening Methodology

To complete the SEA screening exercise for the West Horsley Neighbourhood Plan the following stages were applied:

1. The generic requirements of the SEA Directive were applied in accordance with the Assessment criteria specified in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005), to determine whether a full SEA would be required.

2. The requirements of Article 3(5) of the SEA Directive were applied specifically in relation to the West Horsley Neighbourhood Plan area to determine if the plan could have a significant effect on the environment.

Article 3(5) of the SEA Directive describes and sets out the scope of application of the Directive. It makes SEA mandatory for plans or programmes that are likely to have significant effects on sites designated under the European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). This includes Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Paragraph 5 of Article 3 of the Directive requires that the full criteria identified in Annex II are taken into account when considering the environmental effects of the Neighbourhood Plan and their significance. These criteria are set out below:

The characteristics of plans or programmes, having regard, in particular, to:

- The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size, and operating conditions or by allocating resources.
- The degree to which the plan or programme influences other plans or programmes, including those in a hierarchy.
- The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.
- Environmental problems relevant to the plan or programme.
- The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

The characteristics of the effects and of the area likely to be affected, having regard, in particular to:

- The probability, duration, frequency and reversibility of the effects.
- The cumulative nature of the effects.
- The transboundary nature of the effects.
- The risks to human health or the environment (e.g. due to accidents).
- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).
- The value and vulnerability of the area likely to be affected due to:
  - Special natural characteristics or cultural heritage,
  - Exceed environmental quality standards or limit values,
  - Intensive Land-use,
  - The effects on areas or landscapes which have a recognised National, Community or International protection status.

These criteria and characteristics are developed further in the following section and are presented with reason and comment in the context of the West Horsley Neighbourhood Plan.

This assessment was undertaken of the Submission Version West Horsley Neighbourhood Plan 2016 - 2033, issued in October 2017.
4.2 West Horsley Neighbourhood Plan Screening Assessment

The following section details the application of the SEA Directive to plans and programmes, and illustrates the screening process based on the flowchart presented in A Practical Guide to the Strategic Environmental Assessment Directives which is reproduced in Figure 4-1 (ODPM, 2005). Table 4-1 provides responses to these questions as shown in Figure 4-1 and therefore also details the conclusion of the screening process.

Following this, further assessment of the criteria in Article 3(5) of the Directive is undertaken to demonstrate if the West Horsley Neighbourhood Plan will have a significant effect on the environment.
This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))
   - No to both criteria
   - Yes to either criterion

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))
   - No
   - Yes (to either criterion)

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for development consent projects in Annexes I and II to the EIA directive? (Art 3.2(a))
   - No to either criterion
   - Yes to both criteria

4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))
   - Yes to both criteria
   - No to either criterion

5. Does the PP determine the use of small areas at local level or is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)
   - No to both criteria
   - Yes to either criterion

6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)
   - Yes
   - No

7. Is the PP’s sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)
   - Yes
   - No

8. Is it likely to have a significant effect on the environment? (Art 3.5)*
   - Yes to any criterion
   - No to all criteria

The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

Figure 4-1: Application of the SEA Directive to Plans and Programmes (From: A Practical Guide to the Strategic Environmental Assessment Directive; ODPM, 2005).
### Table 4-1: SEA Screening Process - Generic requirements of the SEA Directive

<table>
<thead>
<tr>
<th>Stage and Question</th>
<th>Answer</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is the Plan or Programme (PP) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))</td>
<td>Yes (proceed to Q2)</td>
<td>The Localism Act 2011 allows for the preparation of Neighbourhood Plans. Once it has successfully gone through all the relevant statutory preparation stages a Local Planning Authority has an obligation to adopt or ‘make’ a Neighbourhood Plan and it then becomes part of the statutory development plan for the relevant Local Authority area. Consequently, Neighbourhood Planning is directed by/through a legislative procedure.</td>
</tr>
<tr>
<td>2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))</td>
<td>No (Yes when ‘made’ so proceed to Q3)</td>
<td>The preparation of Neighbourhood Plans is not mandatory; a Town/Parish Council or Neighbourhood Forum can choose whether or not to undertake preparation of such a plan. However, if the relevant body decides to prepare a Neighbourhood Plan, that Town/Parish Council or Neighbourhood Forum is required to follow the set regulatory and administrative procedures. It will also form part of the Development Plan when adopted or ‘made’ by the Local Planning Authority and it is important to determine whether significant environmental effects are likely and whether further assessment is required.</td>
</tr>
<tr>
<td>3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the Environmental Impact Assessment EIA Directive? (Art. 3.2(a))</td>
<td>Yes to both criteria (proceed to Q5)</td>
<td>The West Horsley Neighbourhood Plan sets out a vision for the Parish and provides landowners and developers local policies to adhere to during the design stage. Once adopted or ‘made’ by the Local Planning Authority it will form part of the planning policy for the area and will provide a framework for future development consent and a material consideration in planning decisions. It is therefore prepared for town and country planning and land use, and it does set a framework for future development consent.</td>
</tr>
<tr>
<td>4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))</td>
<td>N/A</td>
<td>Not applicable as both criterion to Q3 answered “Yes”. However, potential significant impacts on the European sites are addressed further below (see question 8 and section 3).</td>
</tr>
</tbody>
</table>
| 5. Does the PP determine the use of small areas at local level OR Is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3) | Yes (proceed to Q8) | As discussed above, the West Horsley Neighbourhood Plan aims to establish a clear set of policies and guidelines to support the organic development of West Horsley. Its scope covers: - Housing, including design - Community assets, infrastructure and business economy - Environment and landscape. However, this is only in relation to the Parish of West Horsley, with the majority of policies relate to specific, small/character areas of the village itself; it can therefore be considered as determining the use of small areas at a local level only. However, it is not a minor modification of a
<table>
<thead>
<tr>
<th>Stage and Question</th>
<th>Answer</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art 3.4)</td>
<td>N/A</td>
<td>Not applicable as both criterion to Q5 answered &quot;No&quot;. However, the Neighbourhood Plan does allocate sites for future housing development within the parish of West Horsley. This is not considered to have a significant environmental impact due to the nature of the policies to protect green spaces, village character and the environment, amongst others.</td>
</tr>
<tr>
<td>7. Is the PP’s sole purpose to serve national defence or civil emergency, OR Is it a financial or budget PP OR Is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)</td>
<td>N/A</td>
<td>The West Horsley Neighbourhood Plan is not prepared for any of the purposes opposite.</td>
</tr>
<tr>
<td>8. Is it likely to have a significant effect on the environment? (Art 3.5)</td>
<td>No (see Table 4-2)</td>
<td>The West Horsley Neighbourhood Plan is unlikely to have any significant effect on the environment. See Table 4-2 below and Section 3 which provide further justification of this conclusion.</td>
</tr>
</tbody>
</table>

Following assessment against the generic requirements of the SEA Directive, the specific requirements of Article 3(5) have been considered, as detailed in Table 4-2.
Table 4-2: SEA Screening Process - Specific Requirements of Article 3(5)

<table>
<thead>
<tr>
<th>SEA Directive (Annex II)</th>
<th>Explanation</th>
<th>Will the West Horsley Neighbourhood Plan have a significant environmental impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Characteristics of the Neighbourhood Plan</strong></td>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>
| Degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size, and operating conditions or by allocating resources | The West Horsley Neighbourhood Plan sets out a vision for the Parish, including the separate Character areas, which can be used to influence the outcome of future planning applications, consistent with the needs and expressed opinions of residents, including:  
- Housing including design management to ensure local character of area is maintained  
- Support and improve community facilities, schools (Raleigh School) and local business (rural businesses)  
- Conservation and enhancement of the environment, including local green spaces and green/blue infrastructure  
In order to achieve this, a number of key objectives relating to housing and design, community assets and business economy, and environment and landscape have been developed, alongside several more detailed policies. Policies are worded in order to enshrine protection of green space, biodiversity, landscape, community assets and heritage throughout the planning policy. Once adopted, the Neighbourhood Plan will form part of the Guildford Local Plan and planning applications within the plan area must be determined in accordance with the Neighbourhood Plan policies. | No                                                                                   |
| Degree to which the plan or programme influences other plans or programmes including those in a hierarchy | The West Horsley Neighbourhood Plan covers a small, defined Parish within the context of the Guildford Local Plan area. The Neighbourhood Plan will be in general conformity with the strategic policies of the Guildford Local Plan and the National Planning Policy Framework. Once adopted/'made' the Neighbourhood Plan will form part of the Development Plan for Guildford borough. | No                                                                                   |
| Relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development | Throughout the plan, integration of environmental considerations and promotion of sustainable development is central to the specific objectives and policies, such as:  
- Unnecessary loss of mature trees and woodland character (WH1, WH2)  
- Retain boundary and established hedgerows (WH1)  
- Natural green spaces should be encouraged (WH2, WH11)  
- Preserve open field and woodland character (WH3)  
- Limit light pollution (WH15)  
- Protect green and blue infrastructure (WH12)  
- Avoiding harm to designated nature conservation sites (WH14)  
- Planting of indigenous trees (WH14) | No                                                                                   |
<table>
<thead>
<tr>
<th>SEA Directive (Annex II)</th>
<th>Explanation</th>
<th>Will the West Horsley Neighbourhood Plan have a significant environmental impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental problems relevant to the plan or programme</td>
<td>Within and around West Horsley Parish there are a number of sensitive environmental receptors, including:</td>
<td>No</td>
</tr>
<tr>
<td>- Protect Local Heritage Assets and the Conservation Area (WH1, WH8, WH9)</td>
<td>- <strong>The Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC</strong> - see previous section 3 for the Habitat Regulations Assessment (HRA) screening which fully assessed the potential impacts of each individual objective and policy on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC. The HRA concludes that the West Horsley Neighbourhood Plan will not have an adverse impact on the integrity of any European sites, given the scale and nature of the objectives and policies within the Neighbourhood Plan, many of which are consistent with the conservation objectives of the SAC and SPA.</td>
<td></td>
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<tr>
<td>- Protect community facilities (WH6, WH7)</td>
<td>- <strong>Ockham and Wisley Common SSSI</strong> - this site is a component of the Thames Basin Heaths SPA and is designated for its heath, mire and standing water habitats and invertebrate assemblage, in particular its outstanding Dragonfly assemblage and a number of rare invertebrates (i.e. Hornet Robberfly <em>Asilus crabroniformis</em>, Heath Tiger Beetle <em>Cicindela sylvatica</em> and a fly <em>Thyridanthrax fenestratus</em>). Given that the SSSI is outside of the Neighbourhood Plan area, and located approximately 2.5km from the boundary of it, the same conclusions as reached in relation to the overlapping SPA, as detailed in the HRA previously, can also be applied to this SSSI and consequently no adverse impact is anticipated as a result of the Neighbourhood Plan.</td>
<td></td>
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<tr>
<td>- <strong>Sheepleas SSSI</strong> - this site is situated on the dip-slope of the North Downs which includes pedunculate oak-ash-beech woodland on chalk and fragments of south-east chalk grassland. These habitats support a considerable diversity of invertebrates, particularly butterflies (Natural England, 2017a). This SSSI is located within the West Horsley Parish boundary, located to the south-east. However, the policies within the Neighbourhood Plan aim to create new green spaces (e.g. WH11 which identifies several important green spaces where development will not be supported and WH9 policy which supports the current development of West Horsley Place including the increase of permissive walkways), and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones). In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, including Sheepleas SSSI, therefore, no developments would be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.</td>
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</table>
### Will the West Horsley Neighbourhood Plan have a significant environmental impact?

<table>
<thead>
<tr>
<th>SEA Directive (Annex II)</th>
<th>Explanation</th>
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</table>
| - **Combe Bottom SSSI** - this site is located approximately 1km south of the Parish boundary and is designated for its woodland, including moist Wych Elm variant, located on the North Down, with small areas of unimproved chalk downland (Natural England, 2017b). Given that this designated site is located outside of the Parish boundary there will be no direct impacts upon it. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The West Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces (e.g. WH11 which identifies several important green spaces where development will not be supported and WH9 which supports the current development of West Horsley Place including the increase of permissive walkways), and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Combe Bottom SSSI. Furthermore, part of this SSSI is managed by the Surrey Wildlife Trust and as such public access to the site is actively and carefully managed and no significant adverse impact from future development proposals within the West Horsley Parish is anticipated. In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.
| - **Hackhurst and White Downs SSSI** - this SSSI is notified for its lowland calcareous grasslands, Yew and Beech woodland types, Hawthorn scrub and the invertebrate assemblage. Given that it is outside of the Neighbourhood Plan boundary, and located approximately 1.3km south-east, there will be no direct impacts upon this designated site. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The West Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces (e.g. WH11 which identifies several important green spaces where development will not be supported and WH9 which supports the current development of West Horsley Place including the increase of permissive walkways), and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Hackhurst and White Downs SSSI. Furthermore, part of this SSSI is managed by the Surrey Wildlife Trust and as such public access to the site is actively and carefully managed and no significant adverse impact from future development proposals within the West Horsley Parish is anticipated. In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan. |
The West Horsley Neighbourhood Plan contains a number of policies which protect and enhance green and blue infrastructure networks, creating alternative environmental assets to reduce pressures on existing sites, such as Bookham Commons.

In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.

- **Upper Common Pits SSSI** - this SSSI is positioned within the Surrey Hills AONB and has a geological importance due to the presence of several marine fossils which have Red Crag affinities (Natural England, 2017c). This site is located within the West Horsley Parish boundary, located on the southern border. As the Neighbourhood Plan has a policy which protects all designated sites (WH14) it is considered that there will be no direct impacts upon this SSSI. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The West Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces (e.g. WH11 which identifies several important green spaces where development will not be supported and WH9 which supports the current development of West Horsley Place including the increase of permissive walkways), and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Upper Common Pits SSSI.

In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.

- **Bookham Commons SSSI** - is located within Mole Valley district and is approximately 3.5km north-east to the closest point of West Horsley Parish boundary. This SSSI supports several habitat types, such as woodland, scrub, open water and grassland, which provides suitable habitat for a community of breeding birds and important invertebrate population (Natural England, 2017d). As this SSSI is located outside of the parish boundary there will be no direct impacts upon this site, however, indirect impacts (e.g. recreational pressure) could arise from increased residential developments promoted by the Neighbourhood Plan. However, the West Horsley Neighbourhood Plan consists of several policies which support the creation of new green spaces (e.g. WH11 which identified several important green spaces where development will not be supported) and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Bookham Commons.

In addition, policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.

### Table: SEA Directive (Annex II) vs Explanation

<table>
<thead>
<tr>
<th>Explanations</th>
</tr>
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<tr>
<td>any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.</td>
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</tbody>
</table>

### Table: SEA Directive (Annex II) vs Explanation

<table>
<thead>
<tr>
<th>Will the West Horsley Neighbourhood Plan have a significant environmental impact?</th>
</tr>
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<tbody>
<tr>
<td>Yes/No</td>
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</tbody>
</table>

- **Upper Common Pits SSSI**
  - This SSSI is positioned within the Surrey Hills AONB and has a geological importance due to the presence of several marine fossils which have Red Crag affinities (Natural England, 2017c). This site is located within the West Horsley Parish boundary, located on the southern border. As the Neighbourhood Plan has a policy which protects all designated sites (WH14) it is considered that there will be no direct impacts upon this SSSI. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The West Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces (e.g. WH11 which identifies several important green spaces where development will not be supported and WH9 which supports the current development of West Horsley Place including the increase of permissive walkways), and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Upper Common Pits SSSI.

In addition, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.

- **Bookham Commons SSSI**
  - This SSSI is located within Mole Valley district and is approximately 3.5km north-east to the closest point of West Horsley Parish boundary. This SSSI supports several habitat types, such as woodland, scrub, open water and grassland, which provides suitable habitat for a community of breeding birds and important invertebrate population (Natural England, 2017d). As this SSSI is located outside of the parish boundary there will be no direct impacts upon this site, however, indirect impacts (e.g. recreational pressure) could arise from increased residential developments promoted by the Neighbourhood Plan. However, the West Horsley Neighbourhood Plan consists of several policies which support the creation of new green spaces (e.g. WH11 which identified several important green spaces where development will not be supported) and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Bookham Commons.

In addition, policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites, therefore, developments would not be supported if adverse impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.
### SEA Directive (Annex II) | Explanation | Will the West Horsley Neighbourhood Plan have a significant environmental impact?
---|---|---
impacts upon designated sites were likely. It is therefore considered that there will be no impacts upon this SSSI as a result of the Neighbourhood Plan.

- **Papercourt SSSI** - this site is designated for its complex wetland habitat, including unimproved meadows, marshes and flooded gravel pits, which provides substantial habitat for breeding and wintering birds (Natural England, 2017e). This SSSI is located approximately 3.6km north-west from the closest point to the parish boundary, therefore as it lies outside of the parish boundary there will be no direct impacts to this site. However, indirect impacts (e.g. recreational pressure) could arise from increased residential developments promoted by the Neighbourhood Plan. However, the West Horsley Neighbourhood Plan consists of several policies which support the creation of new green spaces (e.g. WH11 which identified several important green spaces where development will not be supported) and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Papercourt SSSI.

- **Colyers Hanger SSSI** - this site is designated as ancient woodland which is of particular interest due to its geological diversity in the escarpment at different levels (Natural England, 2017f). This SSSI is located approximately 3.6km south-west from the closest point to the parish boundary, therefore as it lies outside of the boundary there will be no direct impacts to this site. However, indirect impacts (e.g. recreational pressure) could arise from increased residential developments promoted by the Neighbourhood Plan. However, the West Horsley Neighbourhood Plan consists of several policies which support the creation of new green spaces (e.g. WH11 which identified several important green spaces where development will not be supported) and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Colyers Hanger.

- **Ranmore Common SSSI** - is within the Surrey Hills AONB and is designated for its large area of intact woodland which is situated predominately on plateau deposits (Natural England, 2017g). This SSSI is located approximately 4.1km south-east from the closest point to the parish boundary, therefore as it lies outside of the boundary there will be no direct impacts to this site. However, indirect impacts (e.g. recreational pressure) could arise from increased residential developments promoted by the Neighbourhood Plan. However, the West Horsley Neighbourhood Plan consists of several policies which support the creation of new green spaces (e.g. WH11 which identified several important green spaces where development will not be supported) and protect and enhance green and blue infrastructure networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Colyers Hanger.
<table>
<thead>
<tr>
<th>SEA Directive (Annex II)</th>
<th>Explanation</th>
<th>Will the West Horsley Neighbourhood Plan have a significant environmental impact?</th>
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<tbody>
<tr>
<td>networks (e.g. WH12 which promotes enhancing/maintaining open spaces, footpaths, waterbodies etc. which can be considered as wildlife corridors and stepping stones), creating alternative environmental assets to reduce pressures on existing sites, such as Ranmore Common SSSI.</td>
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<tr>
<td>- <strong>Surrey Hills Area of Outstanding Natural Beauty (AONB)</strong> - the southern part of the West Horsley Parish boundary falls within this AONB. However, the Neighbourhood Plan has policies which aim to ensure there is no impact upon the AONB, such as WH3 which states that any development that wishes to replace smaller scale dwellings with larger dwellings within the AONB will not be supported. Additionally, Policy WH14 of the Neighbourhood Plan states that all development proposals must avoid any adverse impacts upon designated sites which includes Surrey Hills AONB, therefore any proposed development that will compromise the AONB will not be supported. Furthermore, the Plan contains a number of policies within it that will help conserve the landscape of the AONB, including policies aimed at enhancing the landscape and rural village character (e.g. WH1 and WH2 which both detail specific design principles with the aim to retain the local character and views).</td>
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<td>- <strong>Ancient Woodlands</strong> - within and around West Horsley Parish there are several areas of ancient woodland (e.g. Weston Wood, Hazel Copse, Great Wix Wood) which could be adversely affected by any future developments. However, the plan has several policies concerned with retaining local green spaces and mature trees (e.g. WH11 and WH14). It is therefore considered that any future developments will not have an adverse impact upon ancient woodlands.</td>
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<td>- <strong>West Horsley Conservation Area and listed buildings</strong> - whilst future proposed developments could adversely impact upon West Horsley Conservation Area (noted as Character Area 5 within West Horsley Neighbourhood Plan, March 2017) and several listed buildings, there are several policies within the plan that will protect these heritage assets and their settings in the landscape, including WH1, WH3, WH8 and WH9. It is therefore considered that the Neighbourhood Plan will not have an adverse impact upon the local conservation area or listed buildings.</td>
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<td>- <strong>Rural landscape character</strong> - whilst development can have an adverse impact on rural landscape character, the Neighbourhood Plan contains several policies which will help to protect the landscape of the Parish, including those relating to design management within rural areas, light pollution and local green spaces.</td>
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<td>- <strong>West Horsley Character Areas</strong> - West Horsley comprises of nine character areas, identified in the Neighbourhood Plan, which could be impacted upon by future developments. However, several policies</td>
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### SEA Directive (Annex II) | Explanation | Will the West Horsley Neighbourhood Plan have a significant environmental impact?
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Within the plan, most of which are located in Housing and Design Objective section, will stop any developments proceeding that will impact upon the local character of the individual areas.

At this stage it is considered that the Neighbourhood Plan will not introduce any environmental problems, rather it will seek to encourage sensitive development in relation to the environment through integration of environmental protected measures within a number of the policies of the plan. Consequently, it is not considered that the plan will have significant environmental effects.

**Relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)**

The Neighbourhood Plan has a single policy regarding sustainable urban drainage (WH13) highlighting that development proposals have to demonstrate that there is adequate waste water capacity and that sustainable drainage features are suitable. This is of particular importance due to the significant surface water flooding West Horsley experiences during rainfall. Additionally, strategies relating to waste disposal or water protection will be predominantly dealt with by the Guildford Local Plan.

**Characteristic of the effects and of the area likely to be affected**

#### Probability, duration, frequency and reversibility of the effects
Changes that may occur as a result of implementation of the West Horsley Neighbourhood Plan will likely operate over the long-term, but the impacts are expected to be positive by maximising the positive environmental effects and minimising or avoiding negative impacts.

The Neighbourhood Plan addresses specific local development management issues, complementing the higher level strategic policy framework already established through the emerging Guildford Local Plan and National Planning Policy Framework.

**Cumulative nature of the effects**
The future development proposals to support the need for affordable housing within West Horsley Parish along with residential developments elsewhere in the wider area have the potential to cumulatively adversely impact on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC, along with a number of SSSIs, through increased visitor pressures. This has been assessed further as part of a Habitat Regulations Screening Assessment, see Section 3, and also discussed above. The Habitats Regulations Screening Assessment and text above concludes that, given the wording of the policies and the measures promoted within them, the distance to the SAC/SPA/SSSIs, the nature of the development to be permitted, and the management already in place in several of the sites, no adverse impacts on the SAC, SPA, or SSSIs would arise, either alone or in-combination with other plans or projects.

**Transboundary nature of the effects**
In relation to the potential transboundary impacts from the West Horsley Neighbourhood Plan, it is important to consider other plans and policies in adjacent local authorities and neighbourhoods, in particular the local plans and development frameworks (or emerging plans) from Guildford Borough Council (2005), Mole Valley (2017), Elmbridge Borough Council (2015) and Woking Borough Council.

No
### SEA Directive (Annex II) & Explanation

<table>
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<tr>
<th><strong>Will the West Horsley Neighbourhood Plan have a significant environmental impact?</strong></th>
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<tr>
<td><strong>Explanation</strong></td>
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(2012). These have been reviewed and all contain policies within them to help protect sensitive environmental receptors.

In relation to the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC, two of the most notable ecological receptors within the wider area, adverse transboundary effects are not anticipated. As part of the planning policy development process each authority has developed avoidance strategies and guidance notes to help ensure that threats to these sites are not increased as a result of development promoted within the plan. Furthermore, the West Horsley Neighbourhood Plan contains a number of policies to create new green spaces and recreational assets within the parish (e.g. WH11 which promotes the maintenance and enhancement of current green spaces and creation of new green spaces and WH9 which supports the redevelopment of West Horsley Place) which will create alternative assets to reduce pressures on existing sites thereby minimising any indirect adverse impacts of the future developments and increased recreational pressures.

No significant transboundary effects of the policies contained within the West Horsley Neighbourhood Plan are anticipated given that they focus on small-scale areas within the Parish itself.

Furthermore, Neighbourhood Plans are required to relate to discrete administrative areas. By definition, "transboundary" issues and "strategic" matters; therefore, beyond the scope of a Neighbourhood Plan.

<table>
<thead>
<tr>
<th><strong>Risks to human health or the environment (e.g. due to accidents)</strong></th>
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<tbody>
<tr>
<td><strong>No significant risks to human health are anticipated through the implementation of the West Horsley Neighbourhood Plan.</strong></td>
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<td><strong>No</strong></td>
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<tr>
<th><strong>Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</strong></th>
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<td><strong>The Neighbourhood Plan relates to the parish of West Horsley only, with a population of 2,800, and sets out planning policies which can be used to influence future planning applications within the Parish. The majority of the policies within the plan relate to the village of West Horsley itself and are often focussed on existing buildings and formerly developed areas. Consequently, the magnitude and spatial extent of the Neighbourhood Plan is limited and will not have significant environmental effects.</strong></td>
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<td><strong>No</strong></td>
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<tr>
<th><strong>Value and vulnerability of the area likely to be affected due to:</strong></th>
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<tr>
<td><strong>Special natural characteristics or cultural heritage</strong></td>
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<td><strong>Exceeded environmental quality standards or limit values</strong></td>
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<td><strong>Intensive Land-use</strong></td>
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<tr>
<td><strong>As discussed above the West Horsley Parish contains, and is surrounded by, a number of sensitive environmental receptors including:</strong></td>
</tr>
<tr>
<td><strong>The Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC (see Section 3)</strong></td>
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<tr>
<td><strong>Ockham and Wisley Common SSSI</strong></td>
</tr>
<tr>
<td><strong>Sheepleas SSSI</strong></td>
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<td><strong>Combe Bottom SSSI</strong></td>
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<td><strong>No</strong></td>
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</table>
**SEA Directive (Annex II)**

<table>
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<tr>
<th>Explanation</th>
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</table>
| - Hackhurst and White Downs SSSI  
- Upper Common Pits SSSI  
- Bookham Commons SSSI  
- Ranmore Common SSSI  
- Colyers Common SSSI  
- Papercourt SSSI  
- Surrey Hills AONB  
- Ancient Woodlands  
- West Horsley Conservation Area  
- Rural Landscape Character  
- West Horsley Character Areas |

The policies of the West Horsley Neighbourhood Plan include the protection of green space, biodiversity, landscape, community assets and heritage throughout planning policy, it is therefore considered that there will be no impacts upon these sensitive environmental receptors.

**Effects on areas or landscapes which have a recognised National, Community or International protection status**

It is not anticipated that the West Horsley Neighbourhood Plan will adversely impact on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC (see Section 3), the surrounding SSSIs, the Surrey Hills AONB and/or other areas/landscapes of community importance, as detailed above. Furthermore, the policies include the protection of green space, biodiversity, landscape, community assets and heritage and it is likely that the Neighbourhood Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative impacts.

No
4.3 SEA Screening Assessment Conclusion

Preparation of a Neighbourhood Plan by West Horsley Parish Council is being undertaken in accordance with the Neighbourhood Planning Regulations 2012. The plan covers the period 2016 - 2033 and sets out a vision for the parish and policies for future development proposals consistent with the objectively assessed needs and expressed opinions of residents. Within the plan there are three specific objectives, beneath which sit a number of policies relating to housing, the environment, community assets, infrastructure and the local economy.

This SEA Screening Report, supported by a Habitats Regulations Screening Assessment (see Section 3), identified whether or not the West Horsley Neighbourhood Plan requires a SEA by assessing the potential high-level environmental impacts that may arise from implementation of the plan.

In conclusion, it is considered that the West Horsley Neighbourhood Plan does not require a SEA. This is primarily because the nature, scale and location of the policies within the plan are not likely to adversely impact on any of the sensitive environmental receptors within or around West Horsley Parish, including the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC (see Section 3).
5 Conclusion

5.1 Conclusion
The above Habitat Regulations Assessment and SEA Screening assessment has identified that the West Horsley Neighbourhood Plan will not have an adverse impact on the integrity of any European designated sites or important environmental receptors. The West Horsley Neighbourhood Plan includes several policies which aim to protect, maintain and enhance environmental features such as local green spaces, designated sites and mature trees, it is therefore considered that this Neighbourhood Plan could benefit the local environment.

5.2 Consultation
West Horsley Parish Council/ Guildford Borough Council is required to consult with the three statutory environmental consultees: Historic England, the Environment Agency and Natural England at the screening stage.

On behalf of West Horsley Parish Council, JBA Consulting submitted this Habitat Regulations Assessment and SEA Screening assessment to the three statutory environmental consultees on Wednesday 3rd January 2018. The statutory consultees were given until Wednesday 7th March 2018 to provide any comments regarding the Screening assessment.

The Environment Agency was the only consultee to respond and they provided no comments disagreeing with our determination that the West Horsley Neighbourhood Plan does not require a Strategic Environmental Assessment.
Appendices

A Character Areas
References


Natural England (2017a), Sheepleas SSSI Site Citation [Online], Available at: http://www.sssi.naturalengland.org.uk/citation/citation_photo/1001171.pdf [Accessed 06/02/2017]

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Appendix 2: Consultation email sent to Natural England, Historic England and the Environment Agency

(See next page)
Dear Sir/Madam,

I am contacting you regarding the West Horsley Neighbourhood Plan, West Horsley Parish Council and Guildford Borough Council is in the process of developing the Neighbourhood Plan for the ward.

In order to determine whether or not the Plan requires a Strategic Environmental Assessment (SEA) a screening assessment has been carried out. **After consideration, it is considered that the West Horsley Neighbourhood Plan does not require a Strategic Environmental Assessment.** To support this decision a Habitats Regulations Assessment screening has also been undertaken. Please find attached a report supporting this conclusion for your consideration.

If you disagree with our determination that the Strategy will have no significant environmental effects and does not therefore require a SEA, you are invited to make representations in writing, to jennifer.pullen@jbaconsulting.com by Wednesday 7th March 2018.

Kind Regards,

Jennifer Pullen
Ecologist

JBA Consulting, Epsom House, Chase Park, Redhouse Interchange, Doncaster, South Yorkshire, DN6 7FE. Telephone: +44 1302 337798


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